Charlotte Mecklenburg Library

October 10, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Modernizing the E-rate Program for Schools and Libraries WC Docket No. 13-184**

Dear Secretary Dortch:

The E-rate Program provides critical support for digital learning and public access to online information through America's libraries. For this reason, the Charlotte Meckenburg Library supports the comments of the American Library Association (ALA) on Modernizing the E-rate Program for Schools and Libraries. As our most important priority, we ask the Federal Communications Commission (FCC) to move quickly to increase E-rate funding to jumpstart and sustain high-capacity broadband connections in our libraries and schools so that we may meet the pressing information and learning demands of our communities.

Charlotte Mecklenburg Library serves a population of a million residents of Mecklenburg County, North Carolina with more than 850,000 computer sessions last year, averaging 45 minutes a session. In addition, more that 240,000 Wi-Fi sessions were provided to customers on personal laptops, mobile tablets and other similar devices. Through these internet sessions, Charlotte Mecklenburg Library supports Mecklenburg County residents in the areas of educational attainment and increasing the high school graduation rate, employment searching and the development of workforce skills as well as e-government resources and services all increasingly moving to "the cloud" and often *only* available in an online environment.

In a recent Pew Internet Project survey, 70 percent of parents reported their child visited a public library in the past 12 months. Of these, 77 percent of children ages 12-17 went to the library to do school work; this is true of a majority of *all* children. Together schools and libraries ensure learners have access to technology-enabled and personalized educational opportunities during the school day—and beyond, even when formal schooling is complete. We know learning doesn't end when the last school bell rings. For example, a customer at our University City location was able to complete his criminal justice degree using the bandwidth and computers at that location. E-rate is the engine that drives many of these services that foster critical thinking, collaboration, and innovation among our students.

Libraries also serve non-traditional students—whether home-schooled, pursuing their General Equivalency Degree, participating in distance learning, or gaining new technology skills to advance work readiness. Libraries are uniquely situated to support 21st century education and

lifelong learning because they provide internet access to *all* residents in the communities they serve. In fact, our library is the only institution providing substantive no-fee computer and internet access in Mecklenburg County.

E-rate has provided crucial financial support for connecting our libraries and communities to a wealth of internet-enabled resources and services. But to ensure our students have the edge they will need to compete in today's and tomorrow's global economy, our libraries and schools must move from basic—often inadequate connectivity—to 21st century broadband. Thus the Charlotte Mecklenburg Library supports the Commission's first goal of the E-rate program to focus on high-capacity and affordable broadband connectivity.

If we are to meet the challenge of connecting our nation's students and learners to high-capacity broadband in the next five years as proposed by President Obama in June, we need to use the E-rate authority to quickly allocate additional temporary funding to support the deployment of "future-proof" fiber broadband capacity to libraries and schools. The "ConnectUS" proposal laid out by the ALA would address one-time deployment costs to establish the state-of-the-art networks needed to bolster bandwidth at affordable costs for many years into the future. Additionally, the Faster Internet Networks for All Libraries (FINAL) program would incent low-bandwidth libraries to take advantage of existing high-capacity broadband and thus "fast track" innovative services to their communities. Charlotte Mecklenburg Library supports both of these proposals to catalyze needed broadband improvements. We must do better, and we can't afford to wait.

At the same time it is also important to streamline the program so that it is more accessible to all libraries and thus may benefit more communities. Even with the support of our state library e-rate coordinators, program complexity is the top reason libraries choose not to participate in the program. We cannot afford to leave these libraries behind and thus implore the Commission to implement the E-rate streamlining suggestions outlined in ALA's comments.

To support these E-rate goals, we support the initial comments filed by the ALA, and we want to focus particular attention to the following recommendations:

Ensure Affordable Access to 21st Century Broadband
- Increase E-rate funding to jumpstart and sustain high-capacity broadband connections that support digital learning and economic development through libraries and schools. The current cap on the program consistently falls far short of meeting demand. To address this we support a two-pronged approach: 1). New temporary funding to support the build-out of high-capacity broadband networks and provide increased support for libraries with the lowest levels of broadband capacity. 2). A permanent increase in the funding cap is needed and justified to address the ongoing costs of sustaining increased broadband connectivity.
- Increase eligibility for Priority 2 funding. Hardware replacement (PCs, routers, switches, UPS, servers, WiFi access points, etc.) ought to be better funded under Priority 2. In particular, Priority 2 funding ought to be available to more library systems, and ought to be more predictably available, in order to support a sustainable hardware upgrade/replacement cycle.

- In cooperation with the library community, the FCC should develop scalable bandwidth targets and benchmarks for measuring progress against these goals. ALA recommends looking to newly developed public access technology benchmarks[1] and the National Broadband Plan[2] to inform these targets for libraries. We also suggest FCC targets must allow for significant local differences, including community size and current broadband options. We oppose rigid mandates or burdensome metrics.

Include hardware, filtering, and professional services supporting WiFi and mobile devices for Priority 1 and Priority 2 funding

The number of personal mobile devices, both library-owned, and customer-owned, being used in our libraries is growing, to the extent that we will need to reconfigure our WiFi infrastructure to handle it. We have already increased the amount of bandwidth allocated to wireless use. This increases a number of costs, including

- new wireless access points and wiring
- professional services to re-configure IP address ranges assigned to wireless devices (a class-C license on 192.168.x.x doesn't "cut it" anymore)
- filtering an increasing number of devices owned by customers using Library WiFi – we recently had to add 500 filter licenses to handle the growth in use of personally-owned devices.
- an increasing number of smart phones, tablets, and other smart devices used by staff to provide mobile reference, circulation, and programming

Ensure hosted and virtual services are eligible for Priority 1 funding

IT services are moving to the cloud. E-rate funding needs to move with it. Hosted services need to be clearly and unambiguously e-rate reimbursable, including services like:

- Hosted office productivity suite (e.g. Office 365)
- Hosted e-mail (e.g. Exchange)
- Hosted VoIP
- Hosted network file storage
- Thin client and virtualized servers (e.g VMware on both servers and for providing desktop services)
- Web hosting

Continue to fund POTS and paging systems

Paging systems require maintenance, repair, and replacement. They are not 'archaic' systems. POTS lines will remain a cost center in their own right for the foreseeable future.

- Plain old telephone service (POTS): Large libraries may use VoIP for our internal telephone system, but the Library requires POTS lines for a number of life-safety and elevator systems. Fire panels, security alarms, access card systems and elevators all still require POTS lines and it can be a significant expense for an urban multi-site library system like ours. Many small, rural libraries still depend on POTS, and will continue to do so for the foreseeable future.

---

[1] Edge benchmarks available at http://www.libraryedge.org/benchmarksv1. Benchmark 9.2 recommends that each public Internet user is allocated at least 500 Kbps upload and 1 Mbps download of network bandwidth capacity.
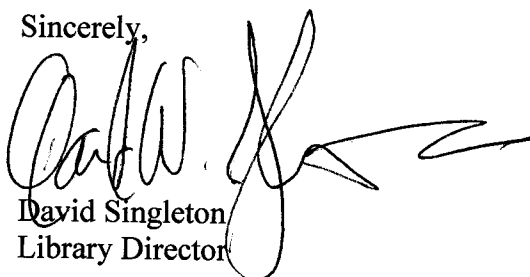[2] The National Broadband Plan, developed by the FCC, is available at http://www.broadband.gov/plan/.

- Paging systems: Can you imagine a large school without a paging system? Can you imagine a large library without a paging system to assist with fire or other emergency evacuation announcements? Large library locations also require paging systems to manage a number of functions from program announcements to orderly closing.

As the Commission considers cost-effectiveness and how to best focus the E-rate program on high-capacity broadband, we urge you to phase in any changes in currently eligible services. Many of our libraries—particularly those with the leanest of budgets—rely on services that are now E-rate eligible, like Plain Old Telephone Service (POTS). The Commission should phase-out the elimination of any E-rate eligible services over a sufficient time to enable libraries to adjust their budgets to pay the full cost of any eliminated services.

An investment in Charlotte Mecklenburg Library is an investment in lifelong learning and Internet access for all residents of Mecklenburg County —especially for those who lack home broadband access. The E-rate Program is the engine powering much of our work to ensure no one is excluded from digital opportunity. Charlotte Mecklenburg Library looks forward to continue helping fulfill our nation's Universal Service goals through a future-focused and robust E-rate 2.0. Thank you for the opportunity to comment and for your consideration of our recommendations.

Sincerely,

David Singleton
Library Director